

# **EXHIBIT 2**

**Chart of Identified Witnesses**

\*The following witnesses will be key witnesses in this case, if it survives dismissal, on issues related to additional evidence of substantial truth and lack of harm given the underlying facts in the 1989 investigation, interrogations, prosecution and trials of the five wrongly convicted teens (the "Five") for the rape of the Central Park Jogger; the 2002 reinvestigation after Matias Reyes confessed to the rape and his DNA alone matched; the 2014 vacation of the Five's convictions; and the portrayal of the Fairstein character in the Series and Plaintiff's involvement in, and admissions regarding, the investigation, interrogation, prosecution, and convictions.

	<b>Witnesses*</b>	<b>Description</b>	<b>State of Residence</b>	<b>Source for State of Residence</b>	<b>Citation to Plaintiff's Papers referencing witness</b>
Witnesses cited in Complaint and noted in Declarations of Jacqueline Giannini and Ava DuVernay.					
1.	<b>Nancy Ryan</b>	Manhattan ADA  1989 investigation and prosecution; 2002 reinvestigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 12.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 6-7, 17-18, 20, 30-32 (citing Defs.' Appx. 1-3, 5 [ECF 29-1 to 29-3, 29-5], Pl.'s letters/statement, Ryan Affirmation);  Pl.'s Decl. [ECF 44-1] at ¶¶ 14-15, 36-37, 42-43;  Pl.'s Appx. [ECF 46-1] at P-APP339-344;  Compl. [ECF 1] at ¶¶ 46, 87-96, 126-129, 176, 178, 237, 278, 318, 361.
2.	<b>Peter Casolaro</b>	Manhattan ADA  2002 reinvestigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 1.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 22;  Pl.'s Decl. [ECF 44-1] at ¶¶ 12, 42;  Compl. [ECF 1] at ¶ 127.
3.	<b>Elizabeth Lederer</b>	Manhattan ADA  Line prosecutor during 1989 investigation and prosecution	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.  <i>Will travel for Plaintiff</i>	Giannini Decl. [ECF 26-3] at ¶ 9; <i>see also</i> Decl. E. Lederer [ECF 41-5] at ¶ 1.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 2, 5-6, 7, 17, 28, 30, 33, 35-36;  Compl. [ECF 1] at ¶¶ 39-40, 46, 57, 64, 82-89, 106-125, 132-150, 248.
4.	<b>Tim Clements</b>	Manhattan ADA  Line prosecutor during 1989 investigation and prosecution	<b>Ohio</b>  Not subject to subpoena power of M.D. Fla. or SDNY.  <i>Will travel for Plaintiff</i>	Giannini Decl. [ECF 26-3] at ¶ 10; <i>see also</i> Decl. A. Clements [ECF 41-14] at ¶ 1.	Pl.'s Opp. to Jur. Mot. [ECF 41] at 6, 11;  Compl. [ECF 1] at ¶¶ 40, 82, 85, 92, 116, 123.

5.	<b>John Fried</b>	Manhattan ADA  Chief of Trial Division during 1989 investigation and prosecution	<b>New York/ NJ</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 11.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 30 (citing Defs.' Appx. 2 [ECF 29-2], Plaintiff's letters);  Fairstein Decl. [ECF 44-1] at ¶¶ 11-13;  Compl. [ECF 1] at ¶¶ 39, 91.
6.	<b>Detective Robert Honeyman</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 15.	Compl. [ECF 1] at ¶ 56;  Pl.'s Appx. [ECF 46-1] at P-APP38-65.
7.	<b>Detective Robert Nugent</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.  <b>Will travel for Plaintiff</b>	Giannini Decl. [ECF 26-3] at ¶ 16; <i>see also</i> Decl. R. Nugent [ECF 41-7] at ¶ 1.	Pl.'s Opp. to Jur. Mot. [ECF 41] at 6, 11;  Pl.'s Appx. [ECF 46-6] at P-APP1118-20;  Compl. [ECF 1] at ¶ 85.
8.	<b>Officer Eric Reynolds</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.  <b>Will travel for Plaintiff</b>	Giannini Decl. [ECF 26-3] at ¶ 17; <i>see also</i> Decl. E. Reynolds [ECF 41-8] at ¶ 1.	Pl.'s Opp. to Jur. Mot. [ECF 41] at 6, 11;  Compl. [ECF 1] at ¶¶ 56, 58, 63, 64, 69, 71-72, 78, 82, 98, 100-101, 105;  Pl.'s Appx. [ECF 46-2] at P-APP82-83.
9.	<b>Detective Glen Whelpley</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 18.	Compl. [ECF 1] at ¶¶ 38, 80;  Pl.'s Appx. [ECF 46-2] at P-APP339-344;  Pl.'s Appx. [ECF 46-3] at P-APP69, 777-80.
10.	<b>Detective John Farrell</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 19;  <i>see also</i> Exhibit 3 to Price Declaration submitted herewith.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 17;  Pl.'s Decl. [ECF 44-1] at ¶¶ 16-17;  Compl. ¶¶ 63, 66-67, 71-72, 77-80, 82, 98, 101.

11.	<b>Korey Wise</b>	One of the Five wrongfully convicted as young teenager of 1989 rape in Central Park Jogger case	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF 26-1] at ¶ 10.  Defs.' Mot. to Dismiss [ECF 26] at 19.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 1, 5, 29, 33, 36 ( <i>see also</i> Defs.' Appx. 1, 3, 4, 5 [ECF 29-1, 3-5]);  Pl.'s Decl. [ECF 44-1] at ¶¶ 3, 26-27;  Gorycki Decl. [ECF 45-1] at PageID 920-31 (Pl.'s testimony re: reading Wise his rights and visit to Park with Wise and Richardson);  Video statement provided to Court by Plaintiff;  Compl. [ECF 1] at ¶¶ 4, 38-39, 86, 99, <i>passim</i> .
12.	<b>Kevin Richardson</b>	One of the Five wrongfully convicted as young teenager of 1989 rape in Central Park Jogger case	<b>New Jersey/New York area</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF 26-1] at ¶ 11  (within 100 miles of SDNY)	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 1, 5, 29, 35-36 ( <i>see also</i> Defs.' Appx. 1, 3, 4, 5 [ECF 29-1, 3-5]);  Pl.'s Decl. [ECF 44-1] at ¶¶ 3, 16, 26-27, 30-32;  Gorycki Decl. [ECF 45-1] at PageID 927-33;  Video statement provided to Court by Plaintiff;  Compl. [ECF 1] at ¶¶ 4, 38-39, 51, 65, 69-70, 86, 99, 101, 104, 110, <i>passim</i> .
13.	<b>Grace Cuffee</b>	Mother of Kevin Richardson  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF 26-1] at ¶ 2;  <i>see also</i> Exhibit 3 to Price Declaration submitted herewith.	Pl.'s Appx. [ECF 46-1] at P-APP258-59, 261, 349-50, 364, 377-79.
14.	<b>Angela (Angie) Cuffee Black</b>	Sister of Kevin Richardson  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF No. 26-1] at ¶ 13;  <i>see also</i> Exhibit 3 to Price Declaration submitted herewith.	Pl.'s Appx. [ECF 46-5] at P-APP1033-35, 2733-35.

15.	<b>Yusef Salaam</b>	One of the Five wrongfully convicted as young teenager of 1989 rape in Central Park Jogger case	<b>Georgia</b>  Not subject to subpoena power of M.D. Fla. or SDNY	DuVernay Decl. [ECF 26-1] at ¶ 12.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 1, 28-29, 30 ( <i>see also</i> Defs.' Appx. 1, 3, 4, 5 [ECF Nos. 29-1, 3-5]);  Pl.'s Decl. [ECF 44-1] at ¶ 3;  Compl. [ECF 1] at ¶¶ 4, 38-39, 86, 99, <i>passim</i> ;  <i>see also</i> Reply ISO Juris. Mot. at 11.
16.	<b>Sharonne Salaam</b>	Mother of Yusef Salaam  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF 26-1] at ¶ 13;  <i>see also</i> Exhibit 3 to Price Declaration submitted herewith.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 3, 28-29, 30, n. 31;  Pl.'s Decl. [ECF 44-1] at ¶ 25;  Gorycki Decl. [ECF 45-1] at PageID 972;  Compl. [ECF 1] at ¶ 86;  <i>see also</i> Defs.' Mot. to Dismiss [ECF 28] at 8.
17.	<b>Antron McCray</b>	One of the Five wrongfully convicted as young teenager of 1989 rape in Central Park Jogger case	<b>Georgia</b>  Not subject to subpoena power of M.D. Fla. or SDNY	DuVernay Decl [ECF 26-1] at ¶ 12.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 1, 4, 30, 35 ( <i>see also</i> Defs.' Appx. 1, 3, 4, 5 [ECF 29-1, 3-5]);  Pl.'s Decl. [ECF 44-1] at ¶¶ 3, 16, 18, 27;  Video statement provided to Court by Plaintiff;  Compl. [ECF 1] at ¶¶ 4, 38-39, 66, 69-73, 80, 99, 101, 110, <i>passim</i> .
18.	<b>Raymond Santana Jr.</b>	One of the Five wrongfully convicted as young teenager of 1989 rape in Central Park Jogger case	<b>Georgia</b>  Not subject to subpoena power of M.D. Fla. or SDNY	DuVernay Decl [ECF 26-1] at ¶ 12.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 1, 36 ( <i>see also</i> Defs.' Appx. 1, 3, 4, 5 [ECF 29-1, 3-5]);  Pl.'s Decl. [ECF 44-1] at ¶¶ 3, 27;  Video statement provided to Court by Plaintiff;  Compl. [ECF 1] at ¶¶ 4, 38-39, 63-64, 99, 101, 112, <i>passim</i> .
19.	<b>Raymond Santana Sr.</b>	Father of Raymond Santana Jr.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	DuVernay Decl. [ECF 26-1] at ¶ 13;  <i>see also</i> Exhibit 3 to Price Declaration submitted herewith.	Pl.'s Appx. [ECF 46-1] at P-APP352-59, 372-73.

20.	<b>David Nocenti</b>	Manhattan ADA  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 26.	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 30;  Gorycki Decl. [ECF 45-1] at PageID 972;  Compl. [ECF 1] at ¶ 86;  <i>see also</i> Defs.' Mot. to Dismiss [ECF 28] at 8.
21.	<b>Michael P. Joseph</b>	Antron McCray's criminal defense attorney  1989 prosecution/trial	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 27.	Compl. [ECF 1] at ¶¶ 86, 119 (discussing trial and DNA evidence).
22.	<b>Peter M. Rivera</b>	Raymond Santana's criminal defense attorney  1989 prosecution/trial	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 2.	Compl. [ECF 1] at ¶¶ 86, 119 (discussing trial and DNA evidence).
23.	<b>Colin A. Moore</b>	Korey Wise's criminal defense attorney  1989 prosecution/trial	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 29.	Compl. [ECF 1] at ¶¶ 86, 119 (discussing DNA evidence).
Non-profit and corporation witnesses cited in Plaintiff's Opposition, Declaration and Complaint.					
24.	<b>Dutton (Penguin Random House) Corporate rep or Ivan Held, President</b>	2019 termination of Plaintiff's publishing contract	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 20; <i>see also</i> <a href="https://www.penguin.com/publishers/dutton/">https://www.penguin.com/publishers/dutton/</a> .	Pl.'s Opp. to Juris. Mot. [ECF 41] at 8;  Pl.'s Decl. [ECF 35] at ¶¶ 17-18;  Compl. [ECF 1] at ¶ 244.

25.	<b>Safe Horizon Corporate rep or Ariel Zwang, CEO</b>	Plaintiff's 2019 resignation from Board	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 23; <i>see also</i> <a href="https://www.safehorizon.org/get-informed/executive-leadership/#:~:text=Ariel%20Zwang%20has%20been%20the%20CEO%20of%20Safe,human%20trafficking%2C%20and%20many%20other%20forms%20of%20violence">https://www.safehorizon.org/get-informed/executive-leadership/#:~:text=Ariel%20Zwang%20has%20been%20the%20CEO%20of%20Safe,human%20trafficking%2C%20and%20many%20other%20forms%20of%20violence</a> .	Pl.'s Opp. to Juris. Mot. [ECF 41] at 8;  Compl. [ECF 1] at ¶ 253.
26.	<b>Safe Horizon Corporate rep or Michael Slocum, Board Chair</b>	Plaintiff's 2019 resignation from Board	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 23; <i>see also</i> <a href="https://www.safehorizon.org/get-informed/board-of-directors/">https://www.safehorizon.org/get-informed/board-of-directors/</a> .	Pl.'s Opp. to Juris. Mot. [ECF 41] at 8;  Compl. [ECF 1] at ¶ 253.
27.	<b>Vassar College Corporate rep or Elizabeth Bradley, President</b>	Plaintiff's 2019 resignation from Board of Trustees	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 22; <i>see also</i> <a href="https://president.vassar.edu/">https://president.vassar.edu/</a> .	Pl.'s Appx. [ECF 46-23] at P-APP3154-55;  Compl. [ECF 1] at ¶¶ 250-52.
28.	<b>Vassar College Corporate rep or Anthony Friscia. Board Chair</b>	Plaintiff's 2019 resignation from Board of Trustees	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 22; <i>see also</i> <a href="https://www.vassar.edu/trustees/bios/friscia.html">https://www.vassar.edu/trustees/bios/friscia.html</a> .	Pl.'s Appx. [ECF 46-23] at P-APP3154-55;  Compl. [ECF 1] at ¶¶ 250-52.
29.	<b>God's Love We Deliver Corporate rep or Karen Pearl, President &amp; CEO</b>	Plaintiff's 2019 resignation from Board	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 24; <i>see also</i> <a href="https://www.glwd.org/people/karen-pearl/">https://www.glwd.org/people/karen-pearl/</a> .	Pl.'s Opp. to Juris. Mot. [ECF 41] at 8;  Compl. [ECF 1] at ¶ 254.

30.	<b>International Creative Management Partners LLC</b> Corporate rep	2019 termination of Plaintiff's contract	<b>California</b>  Transacts business in New York  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 21.	Pl.'s Appx. [ECF 46-22] at P-APP3117-19;  Compl. [ECF 1] at ¶ 246.
31.	<b>Joyful Heart Foundation</b> Corporate rep or Mariska Hargitay, President	Plaintiff's 2019 resignation from Board	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	Giannini Decl. [ECF 26-3] at ¶ 25; <i>see also</i> <a href="http://www.joyfulheartfoundation.org/about-us/board-directors">http://www.joyfulheartfoundation.org/about-us/board-directors</a> .	Pl.'s Opp. to Juris. Mot. [ECF 41] at 8;  Compl. [ECF 1] at ¶ 254.
Additional Witnesses presented in Plaintiff's Opposition Appx., Declarations, and Complaint. <sup>1, 2</sup>					
32.	<b>James M. Kindler</b>	Manhattan ADA  2002 reinvestigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://ballotpedia.org/James_M._Kindler">https://ballotpedia.org/James_M._Kindler</a> .	Pl.'s Opp. to Mot. to Dismiss [ECF 45] at 30 (discussing Defs.' Appx. 2 [ECF 29-2]).
33.	<b>John Hogan</b>	Manhattan ADA  1989 investigation and prosecution	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.linkedin.com/in/john-hogan-a0a33b1a/">https://www.linkedin.com/in/john-hogan-a0a33b1a/</a> .	Pl.'s Decl. [ECF 44-1] at ¶ 25.
34.	<b>Barbara Jones</b>	Manhattan ADA  1989 investigation and prosecution	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.law.com/newyorklawjournal/alm/D/1202754659464/">https://www.law.com/newyorklawjournal/alm/D/1202754659464/</a> ;  <a href="https://bracewell.com/people/barbara-s-jones">https://bracewell.com/people/barbara-s-jones</a> .	Pl.'s Decl. [ECF 44-1] at ¶ 25.

<sup>1</sup> Plaintiff acknowledges in her Complaint that "more than 100 depositions" were taken in the underlying civil rights action filed by the Five against Plaintiff, the city of New York, and several NYPD detectives and officers. (Compl. ¶¶ 135, 139.) Accordingly, the witnesses cited in Plaintiff's papers, and herein, are only some of the key witnesses that may be called to testify in this case.

<sup>2</sup> Upon information and belief, the following witnesses are deceased: DA Robert Morgenthau, Det. Michael Sheehan, Robert Burns, Esq., Det. Hartigan, Det. Aaron Rosenthal, Det. Scott Jaffer, Det. August Jonza, Howard Diller, Esq., and Justice Thomas Galligan.



35.	<b>Jane Rosenthal</b>	Tribeca Film  Production of Series; Communication with Plaintiff	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.tribecafilm.com/about">https://www.tribecafilm.com/about</a> ;  <a href="https://www.linkedin.com/in/jane-rosenthal-b59b2953/">https://www.linkedin.com/in/jane-rosenthal-b59b2953/</a> .	Pl.'s Appx. [ECF 46-13] at P-APP2759-61 (emails with Plaintiff);  Compl. [ECF 1] at ¶¶ 137-138, 145.
36.	<b>Jermaine Robinson</b>	Suspect  1989 investigation	<b>Pennsylvania/New York area</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.peoplefinder.com/people-search/PA-East%20Stroudsburg-Jermaine-Robinson/">https://www.peoplefinder.com/people-search/PA-East%20Stroudsburg-Jermaine-Robinson/</a>  (within 100 miles of SDNY)	Pl.'s Appx. [ECF 46-8] at P-APP1629, 1634;  see also Defs.' Appx. 5 [ECF 29-5], at ¶¶ 15, 32 n* (referencing Jermaine Robinson);  see also Reply ISO Juris. Mot. at 11 n.9.
37.	<b>Detective Carlos Gonzalez</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<i>Hincapie v. City of New York</i> , Case No. 18 cv 3432, (ECF 97; see also <i>Hincapie v. City of New York</i> , 434 F. Supp. 3d 61 (S.D.N.Y. 2020);  <a href="https://www.courthousenews.com/nypd-accused-of-railroading-teen-for-utah-tourist-murder/">https://www.courthousenews.com/nypd-accused-of-railroading-teen-for-utah-tourist-murder/</a> .	Pl.'s Appx. [ECF 46-1] at P-APP252; [ECF 46-3] at P-APP768-69; [ECF No. 46-5] at P-APP1014, 1072-77.
38.	<b>Detective Humberto Arroyo</b>	New York Police Dept.  1989 investigation	<b>Florida</b>  Not within subpoena power (100 miles) of M.D. Fla.	Pl.'s Decl. [ECF 35] at ¶ 20.	Pl.'s Opp. to Jur. Mot. [ECF 41] at 12;  Compl. [ECF 1] at ¶¶ 64-65, 82, 98, 101, 105.
39.	<b>Detective John Taglioni</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.peoplefinder.com/people-search/NY-John-Taglioni/">https://www.peoplefinder.com/people-search/NY-John-Taglioni/</a> .	Pl.'s Appx. [ECF 46-5] at P-APP1047-1065; [ECF 46-9] at P-APP1739-1757; [ECF 46-10] at P-APP2202-2209, 2215-2227; [ECF 46-11] at P-APP2355-2367;  Compl. [ECF 1] at ¶¶ 82, 99; 101.
40.	<b>Detective Harry Hildebrandt</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.peoplefinder.com/people-search/NY-Bronx-Harry-Hildebrandt/">https://www.peoplefinder.com/people-search/NY-Bronx-Harry-Hildebrandt/</a> .	Pl.'s Appx. [ECF 46-5] at P-APP1066-1083; [ECF 46-9] at P-APP1758-1775;  Compl. [ECF 1] at ¶¶ 82, 98.

41.	<b>Det. Rudolph (Rudy) Hall</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="https://www.peoplefinder.com/people-search/NY-Cambria%20Heights-Rudolph-Hall/">https://www.peoplefinder.com/people-search/NY-Cambria%20Heights-Rudolph-Hall/</a> ; <i>see also</i> <a href="https://www.facebook.com/rudolph.hall1">https://www.facebook.com/rudolph.hall1</a> .	Pl.'s Appx. [ECF No. 46-5] at P-APP1041, 1047.
42.	<b>Det. Thomas McKenna</b>	New York Police Dept.  1989 investigation	<b>New York</b>  Subject to subpoena power of SDNY for both parties  Not subject to subpoena power of M.D. Fla.	<a href="http://www.police-writers.com/thomas_mckenna.html">http://www.police-writers.com/thomas_mckenna.html</a> .	Pl.'s Appx. [ECF No. 46-5] at P-APP1050-52, 1055-58.
43.	<b>Patricia Meili</b>	CP 1989 Rape Victim	<b>Florida</b>  Not within subpoena power (100 miles) of M.D. Fla.  <b><i>Will travel for Plaintiff</i></b>	Decl. T. Meili [ECF41-6] at ¶ 1;  <i>see also</i> Pl.'s' Decl. [ECF 35] at ¶ 20.	Pl.'s Opp. to Juris. Mot. [ECF 41] at 6;  <i>see also</i> Reply ISO Juris. Mot. at 13.